

UNITED STATES DISTRICT COURT

for the

Middle District of North Carolina

United States of America

v.

Ricky Bradley Cooke

Case No. 15mj252

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of July 9, 2015 in the county of Alamance in the Middle District of North Carolina, the defendant(s) violated:

Code Section

Title 18, Section 1952(a)(3)

Offense Description

Use of a facility of interstate commerce namely, the Internet, cellular telephones, and credit cards, to promote the carrying on of a business involving prostitution;

This criminal complaint is based on these facts:

See attached affidavit

☐ Continued on the attached sheet.


Complainant's signature

D. Brent Perley, Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date:

7/31/15 5:10 pm


Judge's signature

City and state:

Durham, North Carolina

Joe L. Webster, United States Magistrate Judge

Printed name and title

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA**

AFFIDAVIT IN SUPPORT OF A COMPLAINT

INTRODUCTION

I, David Brent Perley, being duly sworn, depose and state as follows:

1. I am a Special Agent of the Department of Homeland Security, Immigration and Customs Enforcement (ICE), Homeland Security Investigations (HSI). I have been employed with ICE, including the former U.S. Immigration and Naturalization Service, since May 31, 1988. During the course of employment, I have conducted several criminal investigations relating to violations of Titles 8, 18, 19, 21 and 42 of the United States Code. I have successfully completed the Border Patrol Academy and the Immigration Officer Basic Training Course at the Federal Law Enforcement Training Center in Glynco, Georgia. As a Special Agent with HSI, my duties include investigating violations of federal law concerning the transportation of individuals in interstate commerce for the purpose of prostitution, the harboring of undocumented aliens, and the trafficking of aliens into the United States for the purpose of prostitution, and the laundering of monetary instruments.

2. I am an investigative or law enforcement officer of the United States within the meaning of Title 18, United States Code, Section 2510(7), and am empowered by law to conduct investigations and to make arrests for offenses enumerated in Title 18, United States Code, Section 2516.

3. This affidavit is submitted in support of a complaint and warrant for the arrest of RICKY BRADLEY COOKE, also known as the Target Subject.

4. This Affiant has participated in the investigation summarized in this affidavit. As a result of my personal participation in this investigation, through interviews with and analysis of reports submitted by other HSI Special Agents, and Detectives with the Greensboro and Burlington Police

Departments, I am familiar with all aspects of this investigation. On the basis of this familiarity, and on the basis of other information which I have reviewed and determined to be reliable, I allege that:

5. There is probable cause to believe that the Target Subject and Carl Wayne BLACKMON, Jr., and others as yet unknown, have committed, are committing, and are conspiring to commit offenses involving the use of a facility of interstate commerce namely, the Internet, cellular telephones, and credit cards, to promote the carrying on of a business involving prostitution, in violation of Title 18, United States Code, Section 1952(a)(3); and aiding and abetting, in violation of 18 U.S.C. § 2, (hereinafter referred to as the Target Offenses).

6. Since this affidavit is being submitted for the limited purpose of securing an arrest warrant for the Target Subject, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish sufficient probable cause that the defendants are in violation of the Target Offenses.

Probable Cause

7. Homeland Security Investigations, Winston-Salem, North Carolina, has obtained evidence from law enforcement personnel and other sources that the Target Subject, in the Middle District of North Carolina and elsewhere, used and continue to use facilities in interstate and foreign commerce, namely, the Internet, cellular telephones, and credit cards, with the intent to promote, manage, establish, carry on and facilitate the promotion, management, establishment and carrying on of an unlawful activity, that is, a business enterprise involving prostitution, in violation of North Carolina General Statute 14-204, and thereafter performed and attempted to perform an act to promote, manage, establish and carry on, and to facilitate the promotion, management, establishment and carrying on of such unlawful activity. (In violation of Title 18, United States Code, Section 1952(a)(3)).

8. Beginning in or about, or at some point prior to June 2015, and continuing through at least July 2015, the Target subject and Carl Wayne BLACKMON, Jr., and others known and unknown, operated a prostitution business based in Burlington and Greensboro, North Carolina, through which Target subject and

BLACKMON marketed women to perform prostitution, that is, sexual acts in exchange for money, in various cities, including Burlington and Greensboro, North Carolina, all of which are located in the Middle District of North Carolina. The Target Subject and BLACKMON posted advertisements on a publicly-available classified advertising website (hereinafter, "Website A"), which included sexually explicit photographs of women and offered companionship and escort services, which the instant investigation has revealed is a guise for prostitution.

9. The investigation has revealed that the prostitutes under the Target Subject's and BLACKMON's employ have been harbored at several hotels and an apartment, all located in the Middle District of North Carolina, to include the Econo Lodge, 2133 Hanford Road, Burlington, N.C., the Econo Lodge, 120 Seneca Road, Greensboro, N.C. 27406, the Day's Inn, 3114 Cedar Park Road, Greensboro, N.C., 27405, and 201 East Meadowview Road, Apartment D, Greensboro, N.C. 27406.

10. On July 12, 2015 a 15 year old female hereinafter identified as Jane Doe reported being the victim of coerced prostitution in the area of Burlington, N.C. Based of this information a forensic interview was conducted with Jane Doe by officers employed with the Burlington Police Department on July 15, 2015. Jane Doe disclosed that the prostitution took place between the dates of June 9, 2015 and July 12, 2015.

11. During the interview, Jane Doe described being forced to prostitute for money by two males. Jane Doe described one of the males as being tall, dark-complected, having a lazy left eye, and having a tattoo of an eight ball on his right arm. Jane Doe stated that this male goes by the name of "Ricky" and uses the alias of Brandon Cooke. Jane Doe also stated that this male has a cell phone number of (336) 210-9939 that he utilizes to facilitate prostitution. Jane Doe described the other male as being shorter with long dreadlock styled hair who uses the name CJ and an alias of Carl Jay, and who was recently released from prison. Jane Doe stated that the males threatened her life, the life of her mother and the life of her brother if she did not cooperate with their demands. Jane Doe also detailed in her interview being forced to have sex with multiple males in and around the Burlington, Greensboro, and Fayetteville,

North Carolina areas, and Myrtle Beach, South Carolina for money. Jane Doe stated that she was forced to give the money she received for acts of prostitution to “Ricky” and “CJ”.

12. Jane Doe stated that the Target Subject and BLACKMON posted advertisements on the Internet accessed with his cellular telephone and a laptop for sex with her on Website A using the name “Skyler” and listed her age as either 22 or 23.

13. A search of law enforcement databases revealed a record of a male named Ricky Bradley COOKE having a contact phone number of (336) 210-9939. The results also revealed pictures of the Target Subject, who has a dark complexion, a tattoo of an eight ball on his right arm and a lazy left eye.

14. A search of law enforcement databases revealed the record of a black male named Carl Wayne Blackmon, Jr. and a recent NCDOC photograph depicting that he styles his hair in a long dreadlocked style. A query of BLACKMON’s criminal history confirmed that he was recently released from the North Carolina Department of Corrections on February 21, 2015 and is currently a fugitive from justice.

15. Law enforcement officers conducted a search of Website A for advertisements using the name “Skyler” and located several advertisements for escort services listing the telephone numbers (336) 210-9939, (336) 398-4027, (336) 327-9398, and (704) 727-8421.

16. On July 20, 2013 a Homeland Security Investigations Summons was sent to Website A requesting data associated with the advertisements related to telephone numbers (336) 210-9939, (336) 398-4027, (336) 327-9398, and (704) 727-8421. Website A responded to the subpoena and it was determined that an advertisement dated January 6, 2015 in the escort section with (336) 210-9939 as the contact telephone number had been posted January 6, 2015. The advertisement header reads, “...Roxxi is Ready to play under the sheetz.*”. The customer account information for the advertisement was listed as the email bossbadazz74@_____.com (domain known to your affiant).

17. Website A also provided several other postings for escort services, which offered escort services in the Burlington, Greensboro, and Charlotte areas. Two of those advertisements, dated July 6

and July 9, 2015 advertised escort services with “Skyler” in the Greensboro and Charlotte area.

18. On July 21, 2015 Jane Doe guided law enforcement officers to hotels where she had been forced to have sex for money to include the Econo Lodge, 2133 Hanford Road, Burlington, N.C., the Econo Lodge, 120 Seneca Road, Greensboro, N.C., and the Day’s Inn, 3114 Cedar Park Road, Greensboro, N.C.

19. Jane Doe guided the officers to the Econo Lodge, 120 Seneca Road, Greensboro, N.C. and stated that on or about June 9, 2015, she was taken to rooms 107 and 249 in the hotel by the Target Subject and BLACKMON. The Target Subject placed advertisements on the Internet, received calls from prospective customers, and Jane Doe was forced to have sex with several men. The Target Subject and BLACKMON would drive her to some of the appointments in Greensboro and Burlington areas and several customers picked her up at the hotel and drove her to another location for sex. After each sex session, the customer paid Jane Doe the agreed upon fee and she would give all of the money to the Target Subject or BLACKMON.

20. Jane Doe guided the officers to the Econo Lodge, 2133 Hanford Road, Burlington, N.C., and stated that the Target Subject and BLACKMON kept her in rooms 225, 254, and 256. Again, the Target Subject placed advertisements on the Internet, received calls from prospective customers, and Jane Doe was forced to have sex with several men. Jane Doe was forced to have sex with men for several weeks. The Target Subject and BLACKMON drove her to Wilmington and Myrtle Beach, South Carolina to have sex with men for money and returned to the Econo Lodge in Burlington after each trip.

21. Jane Doe stated to the officers that she had been forced to have sex with numerous men who were tenants in the Econo Lodge where she was staying.

22. Jane Doe guided the officers to the Days Inn, 3114 Cedar Park Road, Greensboro, N.C. and stated that the Target Subject and BLACKMON had driven her to the hotel on an unknown date in June and they briefly visited a woman known only as “Rican” or “Shae” in an unknown room number. Jane Doe was certain that the woman was involved in prostitution activity for the Target Subject and

BLACKMON.

23. Jane Doe stated to the officers that she recalled an incident where the Target Subject had struck "Rican" in the face as punishment for not getting paid for sex. Jane Doe could not recall the date or in which hotel the incident occurred. During the incident, the Target Subject broke a window in the hotel room where the incident occurred with his fist.

24. Your affiant obtained and reviewed a Greensboro Police Report dated June 22, 2015 which related to a vandalism report by the hotel proprietor. The report indicated that a window had been broken in a room rented to a customer named Ricky Cooke. The customer had not reported the broken window and had vacated the room prior to its discovery by hotel staff.

25. Jane Doe guided the officers to 201 East Meadowview Road, Greensboro, N.C. and pointed out the last apartment, Apartment D, as the residence of BLACKMON's father. Jane Doe stated that on or about June 9, 2015, the Target Subject and BLACKMON took her to Apartment D directly after first meeting them. Jane Doe stated that she remained there for a short period before being taken to the Econo Lodge, 120 Seneca Road, Greensboro, N.C. Jane Doe stated that between June 9, 2015 and July 12, 2015, the Target Subject and BLACKMON took her there during the day when she was not being forced to have sex for money. Jane Doe stated that the Target Subject and BLACKMON often took her to the apartment during the day so that she would not be seen and reported to the police.


26. Your affiant conducted a search of law enforcement databases and located several records which indicated that BLACKMON's father, Carl Wayne Blackmon, Sr., resides at 201 East Meadowview Road, Apartment D, Greensboro, N.C.

27. On July 23, 2015, law enforcement officers conducting surveillance of 201 East Meadowview Road, Apartment D, Greensboro, N.C. observed a vehicle leave from in front of the apartment and travel to a nearby restaurant. The driver, matching the description of BLACKMON, was observed exiting the vehicle and entering the restaurant.

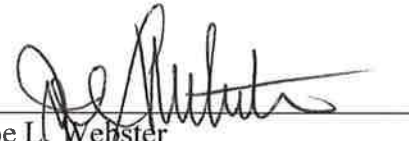
28. Your affiant believes that the aforementioned facts and information provide probable cause

to believe that the Target Subject has utilized several hotels and an apartment, all located in the Middle District of North Carolina, to include the Econo Lodge, 2133 Hanford Road, Burlington, N.C., the Econo Lodge, 120 Seneca Road, Greensboro, N.C. 27406, the Day's Inn, 3114 Cedar Park Road, Greensboro, N.C., 27405, and 201 East Meadowview Road, Apartment D, Greensboro, N.C. 27406, for the purpose of prostitution, and that the Target Subject continues to use facilities of interstate commerce, namely the Internet, cellular telephones, and credit cards to promote the carrying on of a business involving prostitution, in violation of Title 18, United States Code, Section 1952(a)(3).

29. Based upon the aforementioned, as stated above, this affiant respectfully requests that warrant for the arrest of Ricky Bradley Cooke be issued.


D. Brent Perley
Special Agent
Homeland Security Investigations

Sworn to and subscribed before me this ____ day of July, 2015. 5:10 PM


Joe L. Webster
United States Magistrate
Middle District of North Carolina